

Remarks

Applicant respectfully requests reconsideration of this application as amended. No claims have been amended. No claims have been cancelled. Therefore, claims 1-17, 21 and 22 are presented for examination.

Claims 1, 2, 4-11, 13-17, 21 and 22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Kobayashi (UK Patent Application 234920) in view of Sulavuori et al. (U.S. Patent No. 5,636,264) in view of Haartsen (U.S. Patent No. 6,574,266). Applicant submits that the present claims are patentable over Kobayashi in view of Sulavuori and Haartsen.

To establish a **prima facie** case of **obviousness**, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art references when combined must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Kobayashi discloses an option apparatus for a portable terminal unit. The option apparatus of Kobayashi comprises a radio transceiver, an infrared transceiver, and a connector, and the portable terminal unit of Kobayashi comprises a radio transceiver, infrared transceiver, and a connector. In the option apparatus of Kobayashi, a radio transceiver converts electrical signals supplied from the control circuit into RF signals (Kobayashi, p. 13, lines 1-2), and a light emitting unit converts electric signals received from the infrared

transmitter/receiver into infrared radiation (Kobayashi, p. 14, lines 12-18). Nevertheless, Kobayashi does not disclose or suggest an adapter having a processor coupled to an infrared transceiver and a Bluetooth transceiver to convert information received from the infrared transceiver to a Bluetooth protocol format for transfer to the data system and to convert information received from the Bluetooth transceiver to an infrared format for transfer to the infrared data port.

Sulavuori discloses a computer or telecopier coupled to a radio telephone via an infrared connection. In one embodiment, Sulavuori discloses using the computer/telecopier as an external device with the infrared connection between the radio unit, wherein the computer/telecopier would be between the radio phone and a PCMCIA data card. The PCMCIA data card communicates with the radio phone through the infrared connection. Data from a computer/telecopier is converted in correct form for the radio telephone in the PCMCIA data card, which is transmitted by the radio telephone without any conversion when the radio telephone system is digital. See Sulavuori at col. 8, ll. 47-67. However, applicant submits that Sulavuori does not disclose or suggest an adapter having a processor coupled to an infrared transceiver and a Bluetooth transceiver to convert information received from the infrared transceiver to a Bluetooth protocol format for transfer to the data system and to convert information received from the Bluetooth transceiver to an infrared format for transfer to the infrared data port.

Haartsen discloses a system and method for establishing ad hoc communication sessions between remote communication terminals. A base station transmits a beacon signal including information about the identity and system clock of the base station. Remote terminals within range lock to the base station, synchronizing their system clocks with the

base station's clock and setting their hop sequence and hop sequence phase based on information in the beacon signal. See Haartsen at Abstract. Further, Haartsen discloses that Bluetooth systems are envisioned as a universal radio interface in the 2.45 GHz frequency band that enables portable devices to connect and communicate wirelessly via short-range, ad-hoc networks (col. 4, ll. 25-30). Nonetheless, Haartsen does not disclose or suggest an adapter having a processor coupled to an infrared transceiver and a Bluetooth transceiver to convert information received from the infrared transceiver to a Bluetooth protocol format for transfer to the data system and to convert information received from the Bluetooth transceiver to an infrared format for transfer to the infrared data port.

Claim 1 of the present application recites a processor coupled to a infrared transceiver and a Bluetooth transceiver to convert information received from the infrared transceiver to a Bluetooth protocol format for transfer to the data system and to convert information received from the Bluetooth transceiver to an infrared format for transfer to the infrared data port.

As discussed above, none of the references (Kobayashi, Sulavuori or Haartsen) discloses or suggests a processor coupled to an infrared transceiver and a Bluetooth transceiver to convert information received from the infrared transceiver to a Bluetooth protocol format for transfer to the data system and to convert information received from the Bluetooth transceiver to an infrared format for transfer to an infrared data port. Since neither Kobayashi, Sulavuori nor Haartsen disclose or suggest such a feature, any combination of Kobayashi, Sulavuori and Haartsen would also not disclose or suggest the feature.

It is also respectfully submitted that Kobayashi does not teach or suggest a combination with Sulavuori and Haartsen, Sulavuori does not teach or suggest a combination with Kobayashi and Haartsen, and Haartsen does not teach or suggest a combination with

Kobayashi and Sulavuori. It would be impermissible hindsight based on applicant's own disclosure to incorporate the option apparatus for a portable terminal in Kobayashi and the computer/telecopier device with the infrared connection in Haartsen into the system and method for establishing ad hoc communication sessions between remote communication terminals disclosed in Haartsen. Moreover, such a combination would still lack a processor coupled to an infrared transceiver and a Bluetooth transceiver to convert information received from the infrared transceiver to a Bluetooth protocol format for transfer to the data system and to convert information received from the Bluetooth transceiver to an infrared format for transfer to an infrared data port. Consequently, applicants submit that claim 1 is not obvious under § 103 in view of Kobayashi, Sulavuori and Haartsen.

Claims 2-6 depend from claim 1 and include additional limitations. Therefore, claims 2-6 are also patentable over Kobayashi in view of Sulavuori and Haartsen.

Claim 7 recites a processor coupled to an infrared transceiver and a Bluetooth transceiver to convert information received from the infrared transceiver to a Bluetooth protocol format for transfer to the data system and to convert information received from the Bluetooth transceiver to an infrared format for transfer to an infrared data port. Thus, for the reasons described above with reference to claim 1, claim 7 is also patentable over Kobayashi in view of Sulavuori and Haartsen.

Further, claim 7 recites an adapter to transfer information between a computing device and a data system. Applicant submits that nowhere in any of the references is there disclosed or suggested an adapter that transfers information between a computing device and a data system. Instead, Kobayashi discloses a portable terminal unit that communicates with a base station, while Sulavuori discloses a radio telephone system. As a result, claim 7 is

also patentable over Kobayashi in view of Sulavuori and Haartsen since neither disclose nor suggest an adapter to transfer information between a computing device and a data system.

Since claims 8-14 depend from claim 7 and include additional limitations, claims 8-14 are also patentable over Kobayashi in view of Sulavuori and Haartsen.

Claim 15 recites converting information from an infrared format to a Bluetooth protocol format at a processor. Accordingly, for the reasons described above with reference to claim 1, claim 15 is also patentable over Kobayashi in view of Sulavuori and Haartsen. In addition, claim 15 recites a first infrared transceiver to transmit and receive information to and from a first computing device via a first infrared data port, and a second infrared transceiver to transmit and receive information to and from a second computing device via a second infrared data port. Applicant submits that none of the references disclose or suggest an adapter that includes multiple IR transceivers. Moreover, the IR transmitters and receivers disclosed in Kobayashi and Sulavuori do not transmit to multiple devices. Consequently, claim 15 is also patentable over Kobayashi in view of Sulavuori and Haartsen.

Because claims 20 and 21 depend from claim 15 and include additional limitations, claims 20 and 21 are also patentable over Kobayashi in view of Sulavuori.

Claim 16 recites converting information from an infrared format to Bluetooth protocol format at a processor and communicating the information to a network over a Bluetooth link. Therefore, for the reasons described above with reference to claim 1, claim 16 is also patentable over Kobayashi in view of Sulavuori and Haartsen.

Claim 17 recites receiving information at an adapter over a Bluetooth communication link from a network and converting the information from a Bluetooth protocol format to an

infrared signal at a processor. Therefore, for the reasons described above with reference to claim 1, claim 17 is also patentable over Kobayashi in view of Sulavuori and Haartsen.

Claim 22 recites an IR (infrared) to Bluetooth adapter communicatively coupled to an infrared data port, the adapter having a Bluetooth transceiver to transmit and receive information to and from a data system. Therefore, for the reasons described above with reference to claims 1 and 7, claim 22 is also patentable over Kobayashi in view of Sulavuori and Haartsen.

Claims 3 and 12 stand rejected under 5 U.S.C. §103(a) as being unpatentable over Kobayashi-Sulavuori and Haartsen as applied to claims 1, 7, 15, 16 17 and 22 above, and further in view of well known in the art. As discussed above, the claims are patentable over any combination of Kobayashi, Sulavuori and Haartsen. Further, there has been no prior art cited that discloses or suggests a processor converting information from an infrared format to a Bluetooth protocol format, and vice versa.

Applicant respectfully submits that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicant respectfully requests the rejections be withdrawn and the claims be allowed.

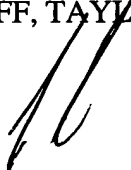
The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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